

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

RANCHERS CATTLEMEN ACTION  
LEGAL FUND UNITED  
STOCKGROWERS OF AMERICA et al.,

Plaintiffs,

v.

TYSON FOODS, INC. et al,

Defendants.

Case No. 0:19-cv-1222-JRT-HB

**RULE 7.1 – CORPORATE  
DISCLOSURE STATEMENT FOR  
JBS S.A.; JBS USA FOOD  
COMPANY; SWIFT BEEF  
COMPANY; AND JBS  
PACKERLAND, INC.**

Pursuant to Federal Rule of Civil Procedure 7.1 Defendants JBS S.A., JBS USA Food Company, Swift Beef Company, and JBS Packerland, Inc. (hereinafter collectively referred to as the “JBS Defendants”), state the following:

1. Defendants JBS Packerland, Inc. and Swift Beef Company are wholly-owned subsidiaries of JBS USA Food Company.
2. JBS USA Food Company is a wholly-owned subsidiary of JBS USA Food Company Holdings (“JBS USA Holdings”).
3. JBS USA Holdings' parent corporation is JBS Luxembourg S.à r.l (“JBS Luxembourg”), a Luxembourg private limited liability company.
4. JBS USA Holdings and JBS Luxembourg are indirect wholly-owned subsidiaries of their ultimate parent JBS S.A., a Brazilian company.
5. JBS S.A. has no parent company, and it is publicly traded. No publicly traded company owns 10% or more of its stock.
6. This filing shall not constitute a waiver by the JBS Defendants of (a) any jurisdictional defenses that may be available, (b) any affirmative defenses under Rule 8 of

the Federal Rules of Civil Procedure, any defense listed in Rule 12(b) of the Federal Rules of Civil Procedure, or otherwise, or (c) any other statutory or common law defenses that may be available to the JBS Defendants in this or any other action. The JBS Defendants expressly reserve their rights to raise any such defenses and any other defense. As to JBS S.A., the undersigned has entered a special appearance as counsel for the explicit purpose of preserving objections to the sufficiency of service of process and personal jurisdiction.

Dated: June 17, 2019

By: s/ Lewis A. Remele, Jr.

Lewis A. Remele, Jr. (MN #90724)  
 Christopher R. Morris (MN #230613)  
**BASSFORD REMELE**  
 100 South 5<sup>th</sup> Street, Suite 1500  
 Minneapolis, MN 55402  
 (612)333-3000  
 lremele@bassford.com  
 cmorris@bassford.com

William F. Hargens (NE #16578 – *Admitted Pro Hac Vice*)

Mark F. Enenbach (NE #15202 – *Admitted Pro Hac Vice*)

Patrick E. Brookhouser, Jr. (NE #19245 *Admitted Pro Hac Vice*)

Matthew G. Munro (NE #26190 – *Admitted Pro Hac Vice*)

**MCGRATH NORTH MULLIN & KRATZ, PC LLO**

First National Tower, Suite 3700

1601 Dodge Street

Omaha, NE 68102

(402) 341-3070

whargens@mcgrathnorth.com

menenbach@mcgrathnorth.com

pbrookhouser@mcgrathnorth.com

mmunro@mcgrathnorth.com

*Counsel for Defendants JBS USA Food Company, JBS Packerland, Inc. and Swift Beef Company*

*\*Special Appearance for Defendant JBS S.A.*

